

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,  
v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Movant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and Bernard L.  
Madoff,

Plaintiff,

v.

KUNTZMAN FAMILY LLC; JACQUELINE D.  
GREEN, in her capacity as a Managing Member of  
the Kuntzman Family L.L.C. and as Trustee of the  
Irrevocable Trust FBO Jennifer Gattegno and the  
Irrevocable Trust FBO Ethan Siegel, both members  
of the Kuntzman Family L.L.C, WAYNE D.  
GREEN, in his capacity as a Managing Member of  
the Kuntzman Family L.L.C.; JUDITH  
GATTEGNO, in her capacity as a Member of the  
Kuntzman Family L.L.C.; IRREVOCABLE TRUST  
FBO JENNIFER GATTEGNO, in its capacity as a  
Member of the Kuntzman Family LLC; and  
IRREVOCABLE TRUST FBO ETHAN SIEGEL, in  
its capacity as a Member of the Kuntzman Family  
L.L.C.,

Defendants

Adv. Pro. No.: 10-04752 (SMB)

**DECLARATION OF NICHOLAS J. CREMONA IN SUPPORT OF OBJECTION  
OF TRUSTEE TO NOTICE OF PRESENTMENT OF AN ORDER  
GRANTING APPLICATION TO WITHDRAW AS COUNSEL, AND  
CROSS MOTION TO STRIKE DEFENDANTS' ANSWER**

I, Nicholas J. Cremona, hereby declare as follows:

1. I am a partner at Baker & Hostetler LLP, counsel for Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III, and the chapter 7 estate of Bernard L. Madoff. I submit this Declaration in further support of the Trustee’s Opposition to Chaitman LLP’s Notice of Presentment of an Order Granting Application to Withdraw as Counsel and Cross Motion to Strike Defendants’ Answer.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Defendant Kuntzman Family LLC’s responses to written discovery.

3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt of relevant pages from the deposition of the corporate representative of Kuntzman Family LLC.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Defendant Kuntzman Family LLC’s amended disclosures.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 11, 2020  
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

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